

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
SAFETY INSURANCE,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 04-11916-JLT
)	
UNITED STATES OF AMERICA))	
)	
Defendant.)	
_____)	

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1

Pursuant to Local Rule 16.1, the parties propose the following Discovery Plan and Motion Schedule for the Court to consider in connection with the initial scheduling conference in this matter currently scheduled for Tuesday, March 1, 2005, at 11:00 a.m.

Proposed Schedule

<u>Event</u>	<u>Deadline</u>
Completion of Written Fact Discovery and Depositions	May 31, 2005
Deadline for Filing Dispositive Motions	June 30, 2005
Final Pretrial Conference	To be scheduled by the Court
Trial	To be scheduled by the Court

Certification

Counsel for the parties will file the certification Local Rule 16.1 requires certifying that each has spoken with his client concerning a litigation budget and alternative dispute resolution programs on or before the initial scheduling conference in this matter currently scheduled for Tuesday, March 1, 2005, at 11:00 am.

Conference with Counsel

Pursuant to Local Rule 16.1(B) and Fed.R.Civ.P. 26(f), counsel for the parties have conferred.

For the plaintiff,

For the defendants,
MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

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Dated: February 22, 2005

- * Per telephone conversation on February 22, 2005, the attorney for the plaintiff, James D. Fitzgerald, authorized AUSA Christopher Alberto to sign the joint statement on James D. Fitzgerald's behalf.